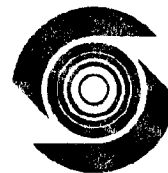


## Memorandum



OEA

99

140.22

747

DATE : November 14, 1979  
TO : Pete Henault  
FROM : Mary Savelle  
SUBJECT: PCB Regulation Compliance

In addition to the recommendations by Irene Jackson (Safety) and Bill Riley concerning revision of handling procedures for transformer inspection/repair work in the Electric Shop, revision of procedures for disposal of oil from damaged transformers, and revision of handling procedures for transformer oil spills (Appendix H of the Emergency Operations Procedures Manual), I would recommend attention to the following areas:

1. Used transformer oil is being burned as "start-up" fuel when the Lake Union Steam Plant is fired up. EPA regulations allow PCB contaminated mineral oil (oil containing 50-500 ppm of PCBs) to be burned in "high efficiency boilers". High efficiency boilers are defined by EPA as power generation boilers and industrial boilers that operate at a high combustion efficiency (99.9%) as defined by the carbon monoxide concentrations and excess oxygen percentages in the combustion emissions. It appears to be necessary to check the efficiency of the Lake Union Plant if City Light is to continue to burn transformer oil there.
2. The transformers at the Skagit should be checked to determine if any of them contain PCBs. The danger of contaminating the river is obviously very high if these transformers are not "clean".
3. Coordination between OCR and OEA is required to handle inquiries from outside City Light concerning PCB regulations and hazards. The letter sent out by General Electric to food processing firms (and possibly other businesses) offering a consultant service to check their electrical equipment for PCB hazards is causing us to receive calls which probably should be handled by OCR. Hugh McIntosh was briefed by Bill and I last week so he could talk to a reporter from the Seattle Times. Bill also talked to the reporter about City Light's compliance with PCB regulations. I would recommend that Hugh be given any further information he might need to answer inquiries on PCBs from customers.
4. The extent of OEA's responsibility in insuring City Light's compliance with federal regulations governing PCBs needs more definition. My understanding of our role is that we should (1) track all regulations

Pete Henault  
November 14, 1979  
Page 2

regarding PCBs, (2) inform appropriate City Light divisions of these regulations, and (3) answer questions about the regulations by City Light personnel. If we are to have any further responsibilities in this matter, we need to have those responsibilities clearly stated and understood. I suggest the Superintendent's cooperation and direction be sought in this role definition.

MS:js

cc: Fletcher  
Pcha/Jackson  
Savelle  
Riley  
OEA (3)  
File

CTY0069420

SEA315834